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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

LIAT ORSHANSKY, on behalf of
 herself and others similarly situated,

Plaintiffs,

vs.

L'OREAL USA, INC. , a Delaware
 corporation; MAYBELLINE, LLC, a
 New York limited liability company
 dba MAYBELLINE, NEW YORK,

Defendants.

CASE NO. 3:12-CV-06342-CRB

**DECLARATION OF C. BRANDON
 WISOFF IN SUPPORT OF
 DEFENDANTS' ADMINISTRATIVE
 MOTION TO STAY DEADLINES**

JUDGE: Hon. Charles R. Breyer

1 I, C. Brandon Wisoff, declare:

2 1. I am an attorney licensed to practice in the courts of the State of
3 California and before this Court, and a partner of Farella Braun + Martel LLP, local
4 counsel for Defendants herein. I have personal knowledge of the matters stated
5 herein and could and would testify competently thereto under oath if required.

6 2. There currently are three other putative class actions pending against
7 Defendants, or some of them, in three other federal jurisdictions (one in the
8 Southern District of New York where Defendants are headquartered, as well as one
9 each in the Southern and Eastern Districts of California) raising allegations similar
10 to those raised herein. The identity of those actions, the dates they were filed and
11 the claims raised therein are more fully set forth in the Declaration of Adam
12 Blumenkrantz, filed herewith.

13 3. Defendants will be filing imminently a petition with the Judicial Panel
14 on Multidistrict Litigation (“MDL Panel”) seeking MDL coordination of all four
15 actions in the SDNY, the jurisdiction in which the first action was filed and where
16 Defendants are headquartered.

17 4. Defendants would like to stay all deadlines and proceedings herein
18 until the MDL petition is decided. Certain deadlines are scheduled to occur within
19 the next several weeks before the Court could likely hear and decide a regularly
20 noticed motion seeking such stay. Specifically, Defendants’ response to the First
21 Amended Complaint is due March 25, 2013. ADR selections are due March 29,
22 2013. Initial Disclosures are due April 3, 2013. The Joint Case Management
23 Statement is due on April 12, 2013. The Court has the initial Case Management
24 Conference scheduled for April 19.

25 5. On March 18, 2013, I spoke by telephone with Mr. Peter Afrasiabi,
26 counsel for Plaintiff herein. I told Mr. Afrasiabi that Defendants had decided to
27 petition the MDL Panel to transfer this putative class action and the two others to

1 the SDNY where the first filed action is pending for coordinated MDL proceedings.
 2 I asked Mr. Afrasiabi if he would stipulate on behalf on behalf of Plaintiff to stay
 3 further deadlines and proceedings in this action, pending (1) a decision by the MDL
 4 Panel whether to transfer this action or, alternatively, (2) a decision by this Court,
 5 after briefing and hearing on a regularly noticed motion, to stay all such deadlines
 6 and proceedings pending a decision by the MDL Panel.

7 6. Mr. Afrasiabi declined to stipulate to either request.

8 7. I then informed Mr. Afrasiabi that Defendants would be filing an
 9 administrative motion seeking an order from this Court to stay all deadlines and
 10 further proceedings herein so as to allow time for Defendants to bring a properly
 11 noticed motion seeking a further stay of all deadlines and proceedings herein until
 12 such time as the MDL Panel has determined where this action may proceed.

13 I declare under penalty of perjury that this declaration was executed this 20th
 14 day of March at San Francisco, California.

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 16 /s/ C. Brandon Wisoff
 17 C. Brandon Wisoff
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